



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

August 17, 2012

Mr. Michael Berkoff
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SRF-6J)
Chicago, Illinois 60604-3507



Dear Mr. Berkoff:

SUBJECT: Comments on the Revised Operation, Maintenance, and Monitoring Plan
Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site
Operable Unit 4: 12th Street Landfill

The Michigan Department of Environmental Quality (MDEQ) has received (April 23, 2012) and reviewed the Revised Operation, Maintenance, and Monitoring Plan (OMMP) for the 12th Street Landfill, Operable Unit 4 of the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site, prepared by Conestoga-Rovers & Associates (CRA) on behalf of Weyerhaeuser NR Company. The MDEQ appreciates the opportunity to assist the United States Environmental Protection Agency (USEPA) by providing comments on the revised OMMP for the 12th Street Landfill.

Comments are presented in the same order as the sections of the OMMP.

General

Most of the comments present in the USEPA's comment letter, dated March 1, 2011, have been addressed. A small number of comments have not been addressed adequately and will require some additional revision. Upon completion of the remaining revisions, as noted below, the MDEQ considers the OMMP acceptable and complete.

Section 2.1 Landfill Cover

Drawings referenced in this section need to be updated to reflect the drawing set provided in Appendix B. For example, the Subgrade Contour Plan is drawing C-02, not C-05, and the Final Contour Plan is drawing C-05, not C-07.

Section 2.3 Site Access Controls

This section needs to either reflect current actual conditions or be revised to identify what the final future site access controls will be. For example, the fencing and gates present at the site do not restrict site access to pedestrians and the required signs and permanent markers have not yet been installed.

Section 4.0 Operation and Maintenance Activities

The explanation provided in CRA's Response to the USEPA's Comments letter, dated April 18, 2012, for omission of required components of the OMMP as specified in the Statement of Work for the Remedial Design and Remedial Action, Appendix E to the Consent Decree for Design and Implementation of Certain Response Action at Operable Unit #4 and the Plainwell, Inc. Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site should be referenced in this section and attached as an appendix to the OMMP.

Section 5.3 Field Quality Control Samples

The revisions to this section do not address collection of the matrix spike and matrix spike duplicate (MS/MSD) samples as outlined in MDEQ, Remediation and Redevelopment Division, RRD Operational Memorandum No. 2, Attachment 5, Sampling and Analysis, dated October 22, 2004. Revisions reflect collection of a rinsate blank in the summary table embedded within the text; however, the rationale and collection method have not been included in the text. Additionally, the rationale and collection method for the MS/MSD will need to be added as additional text to this section.

Section 5.4 Groundwater Monitoring Network and Schedule

The text of this section has not been revised to include upgradient monitoring wells in the quarterly and semiannual monitoring programs as stated in CRA's Response to the USEPA's Comments letter, dated April 18, 2012.

Section 6.0 Landfill Gas Monitoring Program

The reference to Table 1 in this section remains unchanged and appears to reference the incorrect table.

7.2 Reporting

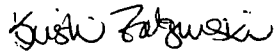
It will be necessary to include the data validation memoranda with the validated data when submitting data as attachments to the quarterly progress reports.

Table 2

Table 2 needs updating of all well names to be consistent with the well names identified in Table 1. Also, monitoring of the upgradient wells in the quarterly and semiannual monitoring programs has not been included in Table 2 as stated in CRA's Response to the USEPA's Comments letter, dated April 18, 2012.

The MDEQ recommends that the USEPA provides these comments to the potentially responsible parties to be incorporated into the final OMMP for the 12th Street Landfill site. The MDEQ looks forward to assisting the USEPA with this site in the future. If you have any questions regarding these comments, please contact me at the number below or at zakrzewskik@michigan.gov at your earliest convenience.

Sincerely,



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